



CITY OF PORTLAND ENVIRONMENTAL SERVICES



Water Pollution Control Laboratory

6543 N. Burlington Avenue, Bldg 217, Portland, Oregon 97203 ■ Nick Fish, Commissioner ■ Dean Marriott, Director

October 23, 2014

Chris Harper
US Army Corps of Engineers
8010 NW St Helens Rd
Portland, OR 97210

COPY

RE: **Warning Notice: Implementation of Narrative Technology Based Effluent Limits and Implementation of SWPCP**
Stormwater Facility Inspection- US Army Corps of Engineers-US Government Moorings, File # 108394

Dear Mr. Harper,

The City of Portland (City) conducted an inspection of the US Army Corps of Engineers (USACE) facility on October 10, 2014. The purpose of the inspection was to evaluate compliance with the 1200-Z NPDES permit issued for the facility.

Warning Notice:

Implementation of Required Narrative Technology-Based Effluent Limits:

Spill Prevention and Response Procedures, Schedule A.1.h: The facility recently added a wastewater tank for cutting table wastewater storage, located outside the weld shop. The tank does not have any secondary containment to prevent leaks or spills from entering the stormwater system. Please evaluate and implement site control measures consistent with the permit requirements.

In addition, please ensure that proper notification phone numbers are posted in prominent locations. The City recommends posting at the Hazardous Materials storage area and at the spill kit locations.

Provide documentation of completion **within 30 days**.

Preventative Maintenance, Schedule A.1.i Facility inspection findings starting in January 2014 noted that catch basin filters and inserts required changing, however, the filters were not changed until April 22, 2014. Prompt maintenance is required to prevent the discharge of pollutants. Please ensure procedures for procurement of needed supplies and maintenance are set up to facilitate prompt response to monthly inspection findings.

Please note the following to ensure permit compliance:

Updates to the SWPCP, Schedule A.6.d: The SWPCP must be kept current at all times to reflect changes in site conditions and operations. Please complete the following revisions and submit **within 30 days**.

1. Add the frequency for oil-water separator cleaning.
2. Add the shut off valves at outfalls A and B to the site map and discuss in the text.

3. Show the building extension of the machine shop building between catch basins B5 and B6 on the site map.
4. Section 2.1.6.4 of the SWPCP states catch basin filters are changed annually, whereas Section 2.1.6.5 and Section 2.1.6.9 state there is a bi-annual change in fall and spring. Please modify all pages referencing catch basin filter inserts to be consistent and also update the frequency of filter changes to reflect the increase as stated in the Tier 1 report prepared in response to the June 12, 2014 benchmark exceedances.
5. Modify Section 2.1.7.1, Catch Basin Filtration, to meet permit requirements for facility inspections. Per Schedule B.7 these must be inspected monthly. The SWPCP currently states these are inspected bi-annually. In addition, include the maintenance frequency for filter and media replacement in the SWPCP.
6. Discuss the wastewater tank for cutting table wastewater in the text and include the location on the site map. Describe practices used for transfer, spill prevention and response procedures and include disposal procedures.
7. Update text and site map with additional CleanWay filter inserts in catch basins B1 and B9, once installed. Update the text and site map with any modifications to the buildings at the facility, once completed. During the inspection we discussed possible removal of the equipment storage building, boiler, paint storage building and the wood shed in the upcoming months.

Employee Education, Schedule A.1.j: Employee education last occurred on October 31, 2013. Please ensure that employee training occurs during the 2014-2015 permit year.

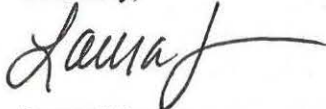
Tier 1 Corrective Action Response, Schedule A.10: The City requires that USACE submit all Tier 1 reports for the 2014-2015 monitoring year, upon preparation.

The City recommends the following to improve stormwater quality:

1. Repair asphalt between the Hazardous Materials storage area and the office to facilitate more effective sweeping.
2. Sample at catch basins B1 and B9 to assess pollutant contribution in relation to what is measured at the stormwater outfall.
3. Rusty iron materials are stored in drainage area A. In order to reduce iron, the materials should be stored indoors or covered with a tarp at all times.

If you have any questions, please feel free to contact me at 503-823-7192.

Sincerely,



Laura Johnson
Industrial Stormwater Program

cc: Art Leskovich, USACE
Rich Muza, US EPA